**EXHIBIT** 

2

## **PART II**

DEFENDANT'S RULE 11 MOTION TO DISMISS

		Page 82			Page 8
1	hourly basis. He only gets paid if you		1	Q. Has anybody?	
2	win the case and attorneys' fees are		2	A. I don't know.	
3	awarded?		3	Q. To your knowledge, has	
4			1	Q. 10 your knowledge, has	
	A. You want to know what, I		4	anybody on behalf of you or on behalf	
5	don't		5	of Disabled Patriots ever been to the	
6	MR. BACON: Objection.		6	premises described in this complaint?	
7	A I don't know.		7	A. Beyond me?	
8	MR. BACON: Ms. Kramer is not		8	Q. Yes.	
9	qualified to answer that.		9	A. Somebody generally goes out	
10	A. I don't know.		10		
11		•		to look and see what the complaint	
	MR. LEONARD: She can give her		11	what my complaints are and if it's	
12	personal knowledge.		12	valid.	
13	Q. Ma'am, what's your		13	Q. Well, ma'am, I'm not asking	
14	understanding of how that works?		14	what generally happens. In this	
15	A. I don't know.		15	lawsuit, has anyone gone to these	
16	Q. Okay. So you've never paid		16	facilities to look at them?	
17	him any money?		17		
18				A. I don't know.	
	A. Never.		18	Q. You have no knowledge of	
19	Q. And he's never asked you pay			that ever happening, do you, ma'am?	
20	him anything?		20	A. None.	
21	A. Never.		21	Q. Okay. And you certainly	
22	Q. Even in all the cases he		22	haven't asked anyone to do that?	
23	served as an expert, you've never paid		23	A. I have not.	
24	him a dime?		24		
25	A. Not a dime.		25		
	A. Not a uline.	<u> </u>	25	do that?	
		Page 83			Page 8
1	<ul><li>Q. And you've never seen a bill</li></ul>		1	A. No.	
2	for him, correct?		2	Q. And to your knowledge that	
3	A. Never.		3	hasn't happened?	
4	Q. Okay. Does Disabled		4	A. Correct.	
5			1		
	Patriots, does that organization ever				
_	hi		5	Q. Okay. And you have not	
6	pay him?		6	prepared any reports about these	
7	A. I don't think so.		6 7		
7 8	<ul><li>A. I don't think so.</li><li>Q. So he works on a contingency</li></ul>		I	prepared any reports about these	
7	A. I don't think so.		6 7	prepared any reports about these facilities or any preliminary reports,	
7 8 9	<ul><li>A. I don't think so.</li><li>Q. So he works on a contingency</li></ul>		6 7 8 9	prepared any reports about these facilities or any preliminary reports, have you?  A. No, beyond the photos that	
7 8 9 10	A. I don't think so. Q. So he works on a contingency basis? A. Yes.		6 7 8 9	prepared any reports about these facilities or any preliminary reports, have you?  A. No, beyond the photos that we took.	
7 8 9 10 11	A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection.		6 7 8 9 10	prepared any reports about these facilities or any preliminary reports, have you?  A. No, beyond the photos that we took.  Q. Correct. And you're not	
7 8 9 10 11	A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff		6 7 8 9 10 11 12	prepared any reports about these facilities or any preliminary reports, have you?  A. No, beyond the photos that we took.  Q. Correct. And you're not aware of anyone doing any sort of	
7 8 9 10 11 12	A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid?		6 7 8 9 10 11 12 13	prepared any reports about these facilities or any preliminary reports, have you?  A. No, beyond the photos that we took.  Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary	
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I don't think so. Q. So he works on a contingency basis? A. Yes. MR. BACON: Objection. Q. Meaning, if the plaintiff wins, he gets paid? A. See, you know what, I don't I'm talking about stuff I don't even really know about. I don't know how that works. Q. Okay. Have you retained him in this case, ma'am? A. I have not retained him, no. Q. Has anybody? A. I don't know. Q. Have you retained any experts		6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	prepared any reports about these facilities or any preliminary reports, have you?  A. No, beyond the photos that we took.  Q. Correct. And you're not aware of anyone doing any sort of preliminary report or preliminary assessment, with respect to these premises, are you, ma'am?  A. No.  Q. Okay. Well, in your complaint that you filed in federal court, ma'am, you make reference to some sort of preliminary assessment or preliminary report. You're not aware of that ever happening, are you, ma'am?  A. I don't know what the	

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		Page 86			Page 88
1	this case and in your complaint you make		1	Q. Now, when you spoke to	
2	reference to some kind of preliminary		2	Pedraza whenever this was and you don't	
3	assessment or preliminary report but you		3	recall when it was, right?	
4	have no idea what that means, do you?		4	A. No.	
5	A. Not really.		5	Q. And you don't recall whether	
6	Q. Because you're not aware of		6	it was over the phone or by e-mail?	
7	that ever happening, right?		7	A. No, I'm sure it was a phone	
8			8	conversation.	
	A. I don't have anything to do with that.		I -		
9	7 7 7 27 7 27 27		9	Q. Okay. Do you have any idea	
10	Q. Okay. Now, your recollection		10	what you said to Pedraza on that	
11	is you contacted Pedraza sometime after		11	occasion and what he said to you?	
12	August of 07, right?		12	A. Well, I think he asked me	
13	A. Correct, or we may have been		13	how my trip to Chicago was and I talked	
14	talking about another issue at the time.		14	about my the time that I spent with	
15	<ul> <li>Q. Would your journal tell us</li> </ul>		15	my son.	
16	when you talked to Pedraza for the first		16	Q. Okay. Do you say anything	•
17	time about these premises that are the		17	else to him?	
18	subject of your lawsuit?		18	A. Yeah, that I mean, Chicago	
19	A. I doubt that I would include		19	was really, really inaccessible and it	
20	a journal entry about talking to Dave		20	just felt like a gigantic obstacle	
21	Pedraza on the phone.		21	course, which is what going around the	
22	Q. You were also exchanging		22	world is in general, but Chicago was	
			23		
23	e-mails with Pedraza?			worse than Cleveland. That was my	
24	A. Rarely.		24	observation.	
25	Q. Sometimes?		25	Q. Did you tell Pedraza anything	
		Page 87			Page 89
1	A. Occasionally.		1	about the premises that we've been	
2	Q. What is your e-mail address?		2	talking about that are the subject of	
3	A. BONITA 1947 at Adelphia		3	your lawsuit?	
4	dot net.		4	A. I said that we had been to a	
5	Q. And how long have you had		5	variety of places, shopping areas, malls	
6	that e-mail address?		6	that we had been to.	
7	A. Since I moved to back to		7	Q. But you didn't identify for	
ı			1		
8	Cleveland Heights from Avon Lake.		8	him this one, did you?	
9	Q. When was that?		9	A. I'm not sure if I did or	
10	A. It'll be two years in March.		10	not.	
11	Q. What was your prior e-mail		11	Q. Okay. You don't have any	
12	address?		12	recollection of doing so?	
13	A. BONITA 1947 at Comcast		13	A. No.	
14	dot net.		14	Q. And then did Pedraza ever do	
15	Q. And how long did you have		15	anything with respect to these	
16			16	facilities?	
1	that e-mail?				
17			17	Did he ever look into them?	
17 18	A. Two years.		17		
18	<ul><li>A. Two years.</li><li>Q. Okay. Did you know what</li></ul>		17 18	Explain about	
18 19	A. Two years. Q. Okay. Did you know what your e-mail before that was?		17 18 19	Explain about A. He might have and I can't	
18 19 20	A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947		17 18 19 20	Explain about A. He might have and I can't tell you if he did or not. I assume he	
18 19 20 21	A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet		17 18 19 20 21	Explain about A. He might have and I can't tell you if he did or not. I assume he did.	
18 19 20 21 22	A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers.		17 18 19 20 21 22	Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't	
18 19 20 21 22 23	A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers. Q. What are some of the other		17 18 19 20 21 22 23	Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't be because of you because you have no	
18 19 20 21 22 23 24	A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers. Q. What are some of the other providers besides Adelphia and Comcast?		17 18 19 20 21 22 23 24	Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't be because of you because you have no idea what the address was when you	
18 19 20 21 22 23	A. Two years. Q. Okay. Did you know what your e-mail before that was? A. It's always B O N I T A 1947 and they've been different internet providers. Q. What are some of the other		17 18 19 20 21 22 23	Explain about A. He might have and I can't tell you if he did or not. I assume he did. Q. But if he did, it wouldn't be because of you because you have no	

		ument 20		Filed 03/06/2008 Page 4 of 24	
		Page 90			Page 92
1	A. Well, I knew what the name		1	Q. But before you filed the	. 490 72
2	of the place was.		2	lawsuit, you have no knowledge that he's	
3	Q. What did you think it was		3	ever been there, right?	
4	called?		4	A. I am very I'm learning	
5	A. Town & Country Mall.		5	more daily about what the ADA	
6	Q. Okay. And did you identify		6	specifications are. And I do a lot of	
7	the mall for him?		7	lawsuits, as I'm sure you're aware of.	
8	A. I told him that it was in		8	What I'm saying to you is, I'm not	
9	Arlington Heights, I think.		9	exactly sure what the order of things	
10	Q. And did you tell him what it		10	are but I do know that an expert goes	
11	was called?		11	out to make sure that what I'm saying	
12	A. Yeah, I think I said that we		12	is actual. That they're actual	
13	went to a Town & Country Mall.		13	violations.	
14					
15	Q. And what did you tell him		14	Q. That's what you think	
	about Town & Country Mall?		15	supposed to happen, right?	
16	A. That there were a million		16	A. I know that's what happens.	
17	things wrong.		17	Q. Well, I'm talking about this	
18	Q. Did you tell him anything		18	case. I'm not talking about in general,	
19	more specific then that?		19	ma'am.	
20	A. No.		20	A. Okay.	
21	Q. And were you telling him so		21	Q. In this case, before you	
22	that he would go out there and look at		22		
23	it?		23	lawsuit, you have no knowledge	
24	A. Maybe on his next visit to		24	whatsoever that anybody ever went to	
25	Chicago.		25	Town & Country and looked at these	
		Page 91			Page 93
1	Q. Has he been to Chicago or	Page 91	1	alleged violations, right?	Page 93
	Q. Has he been to Chicago or the Chicago area since you talked to him	Page 91	1 2	alleged violations, right?  A. I know that Dave Pedraza	Page 93
2	the Chicago area since you talked to him	Page 91	2	A. I know that Dave Pedraza	Page 93
2 3	the Chicago area since you talked to him back in August of 07?	Page 91		A. I know that Dave Pedraza must have taken a look at the property.	Page 93
2 3 4	the Chicago area since you talked to him	Page 91	2 3 4	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there?	Page 93
2 3 4 5	the Chicago area since you talked to him back in August of 07?  A. I think he's been there a couple of times.	Page 91	2 3 4 5	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there? A. I think he did.	Page 93
2 3 4 5 6	the Chicago area since you talked to him back in August of 07?  A. I think he's been there a couple of times.  Q. Has he ever been to the Town	Page 91	2 3 4 5 6	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there? A. I think he did. Q. When did he go there?	Page 93
2 3 4 5	the Chicago area since you talked to him back in August of 07?  A. I think he's been there a couple of times.	Page 91	2 3 4 5 6 7	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know.	Page 93
2 3 4 5 6 7 8	the Chicago area since you talked to him back in August of 07?  A. I think he's been there a couple of times.  Q. Has he ever been to the Town & County Mall to your knowledge?  A. I don't know but if he has	Page 91	2 3 4 5 6	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there? A. I think he did. Q. When did he go there?	Page 93
2 3 4 5 6 7	the Chicago area since you talked to him back in August of 07?  A. I think he's been there a couple of times.  Q. Has he ever been to the Town & County Mall to your knowledge?	Page 91	2 3 4 5 6 7 8	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there?	Page 93
2 3 4 5 6 7 8 9	the Chicago area since you talked to him back in August of 07?  A. I think he's been there a couple of times.  Q. Has he ever been to the Town & County Mall to your knowledge?  A. I don't know but if he has written a report, he has absolutely been there.	Page 91	2 3 4 5 6 7 8 9	A. I know that Dave Pedraza must have taken a look at the property. Q. Oh, so he did go there? A. I think he did. Q. When did he go there? A. I don't know. Q. Did he tell you he went there? A. I don't remember.	Page 93
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	Page	94	Pan	je 96
1	Q. Okay. So you talked to him	- 1	1 Q. Okay. And you didn't	, ,,
2	on this one occasion in August or		2 communicate in writing, by e-mail, memo,	ŀ
3	thereabouts.		3 letter, note or otherwise with anyone	
4	A. Right.			
5				ļ
	Q. And you've never spoken to		5 correct?	ŀ
6	him about this facility since, have you,		A. No, that's correct.	
7	ma'am?		Q. And to your knowledge, nobody	
8	A. I don't think we've ever		8 on your behalf has ever been out to	ŀ
9	spoken about this property again ever.	4	9 Town & Country to do an inspection of	ŀ
10	Q. You have not?	1		
11	A. Have not.	1		
12	Q. Okay. And have you ever	1	2 about that.	
13	spoken to anybody about this property	1	Q. Well, no, you're the	
14	besides Mr. Pedraza the one time we	1	4 plaintiff in the case. I want to know	ľ
15	talked about?	1	•	ļ
16	A. No, except for the attorneys.	1	•	
17	Q. Okay. We'll get into that	1	<b>5</b> ,	ľ
18	in a minute. But with respect to		8 I'm not sure exactly how it works.	
19	Pedraza, have you told me to the best	1	<b>,</b>	
20	of your recollection everything you can	2	<u> </u>	
1	• • • •			
21	remember telling him during your	2	•	
22	telephone conversation?	2	· •	
23	A. Yes.		Q. Who?	
24	Q. Okay. And that telephone		4 A. I assume it was Dave	
25	conversation was to discuss a variety of	2	5 Pedraza.	l
	Page	95	Pag	16 97
1	Page matters right?	- 1		je 97
1	matters, right?		Q. Well, you just told me you	je 97
2	matters, right? A. Yes.		Q. Well, you just told me you didn't know if he's ever been there.	je 97
2	matters, right? A. Yes. Q. So the part about Town &		Q. Well, you just told me you didn't know if he's ever been there. A. I'm assuming that that's what	je 97
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		Page 98			Page 100
1	A. No.	_	1	A. Three years ago.	5
2	Q. And they never told you?		2	Q. And before we get to that,	
3	A. No.				
l			3	what's Pedraza's e-mail?	
4	Q. So you don't know who your		4	A. I don't know.	
5	experts are in this case?		5	<ul><li>Q. You have that available,</li></ul>	
6	<ul><li>A. I'm assuming Mr. Pedraza's</li></ul>		6	though, right?	
7	the person I've worked with.		1 7	A. Yes.	
8	Q. Anybody else who you think		8	Q. Three years ago, how did you	
9	might be your expert in this case?		9	become a member of Disabled Patriots?	
	·				
10	A. No.		10	A. Again, through talking to	
11	Q. Okay. How is Mr. Pedraza		11	in the conversation with Dave.	
12	being paid, with regard to this case?		12	Q. Mr. Pedraza?	
13	A. I don't know.		13	A. Yes, he told me about this	
14	Q. You don't have any agreement		14	organization out of Southern Florida.	
15	with him, do you?		15	<del></del>	
16	A. No.		1	Q. Okay. So the first time	
			16	that your friend kind of put you guys	
17	Q. Does he have an agreement		17	together a few years ago, Pedraza is the	
18	with anybody?		18	one that brings it up, right?	
19	A. I don't know.		19	A. Yes.	
20	Q. So if you happen to recover		20	Q. And what did he tell you at	
21	attorneys' fees or costs, that's how you		21	the time about the organization?	
22	think Pedraza will get paid?		22	A. He said that it was a little	
	<u> </u>				
23	A. I don't know.		23	grassroots organization that was doing a	
24	MR. BACON: Objection. Asked and		24	lot of advocacy.	
25	answered. Mrs. Kramer does not know.		25	Q. Did he tell you anything	
			1		
		Page 99			Page 101
1	O. Well ma'am in your other	Page 99	1	else about it?	Page 101
1 2	Q. Well, ma'am, in your other	Page 99	1	else about it?	Page 101
2	cases you brought where you've included	Page 99	2	A. No.	Page 101
2 3	cases you brought where you've included Pedraza as an expert, you've never paid	Page 99	2 3	<ul><li>A. No.</li><li>Q. When did you join it?</li></ul>	Page 101
2 3 4	cases you brought where you've included Pedraza as an expert, you've never paid him, right?	Page 99	2 3 4	A. No.	Page 101
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		Page 102			Page 104
1	Patriots at the time?		1	Q. When?	
2	A. Yes.		2	A. It was not long after I	
3	Q. Okay. And he sent you an		3	joined the organization.	
4	application?		4	Q. Let me just get this	
5	A. Yes.		5	straight. You submit this piece of	
6	Q. And then do you send it back		6	paper through the mail?	
7	to him or do you send it back to		7	· · ·	
8	Disabled Patriots?			A. Right.	
			8	Q. And your assumption is that	
9	A. I don't think I sent it back		9	you're now a member?	
10	to him. I think I mailed it someplace.		10	A. Yes.	
11	<ul><li>Q. At the time, was he like an</li></ul>		11	<ul><li>Q. But they don't send you</li></ul>	
12	employee, agent of Disabled Patriots		12	anything back a certificate, a card,	
13	A. No.		13	anything to say you're now a member?	
14	Q anything like that?		14	A. That is correct.	
15	A. No, he wasn't. He was just		15	Q. And you've never received	
16	aware of them.		16	anything like that from them?	
17	Q. Okay. And what did you do		17	A. That is correct.	
18	to have to become a member? Just fill		18		
19	out a card?		t .	Q. How do you know you're	
20			19	really a member?	
1	A. Nothing. Just to fill out		20	A. Because there's 20 of us and	
21	an application. It basically just		21	we talk about it. And we had a meeting	
22	talked about how long I had been		22	in Pittsburgh this summer and talked	
23	disabled.		23	about it there.	
24	Q. Okay.		24	Q. Okay. And so there's only	
25	A. The nature of my disability		25	20 members of the organization?	
		Page 103			Page 105
1	but people are welcome to join who are	. 3	1	A. Yes.	. 253 250
2	not disabled.		2	Q. Okay.	
3	Q. Okay. So you don't have to		. ~	<u> </u>	
				Δ Might not even be 20 T	
	- · · ·		3	A. Might not even be 20. I	
4	be disabled to be a member of Disabled		3 4	don't know exactly the number.	
5	be disabled to be a member of Disabled Patriots?		3 4 5	don't know exactly the number. Q. Okay. And Disabled Patriots,	
5 6	be disabled to be a member of Disabled Patriots?  A. That is correct.		3 4 5 6	don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their	
5 6 7	be disabled to be a member of Disabled Patriots?  A. That is correct. Q. Has Pedraza ever been an		3 4 5	don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization?	
5 6	be disabled to be a member of Disabled Patriots?  A. That is correct. Q. Has Pedraza ever been an employee, agent, representative,		3 4 5 6 7 8	don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through	
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	be disabled to be a member of Disabled Patriots?  A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots?  A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send you something back to say you've been accepted as a member?		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	don't know exactly the number.  Q. Okay. And Disabled Patriots, where do they get the money from, their organization?  A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers.  Q. Okay. Now, when you joined the organization or you thought you joined it a few years ago  A. Yes.	
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	be disabled to be a member of Disabled Patriots?  A. That is correct. Q. Has Pedraza ever been an employee, agent, representative, anything with regard to Disabled Patriots?  A. Never. Q. Okay. Is he a member? A. I would guess but I don't know that for sure. Q. And so you didn't have to pay any money to join? A. No. Q. You just submit this piece of paper, right? A. Yes. Q. And then did someone send you something back to say you've been		3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	don't know exactly the number. Q. Okay. And Disabled Patriots, where do they get the money from, their organization? A. They get their money through inspection fees or reinspection fees on properties, after somebody has when a when a place has been found to be out of compliance with the ADA and they either settle or whatever the arrangement, is the attorneys have the option to go back and re and see that the fixes have been made. And when they do that, there's a fee involved and they kick that into the Disabled Patriots coffers. Q. Okay. Now, when you joined the organization or you thought you joined it a few years ago	

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		Page 106			Page 108
1	A. Ten maybe.		1	A. Maria Gallagher, who is the	
2	Q. Okay. And are those ten		2	president of this organization and I	
3	people still members.		3	wanted to get together and start mapping	
4	A. I think so.		4	out a plan by which we could grow this	
5	Q. Okay. And can I go to a web		5	origination.	
6	site or anything like that to figure out		6	Q. Maria Gallagher is the	
7	anything about the organization?		7	president of Disabled Patriots?	
8				·	
	A. No, but it's coming.		8	A. Correct.	
9	Q. There is no web site?		9	Q. How long has she held that	
10	A. Right.		10	title?	
11	Q. There's never been?		11	A. From the beginning of	
12	A. No.		12	Disabled Patriots. I'm assuming it's	
13	<ul><li>Q. And it doesn't have any</li></ul>		13	five or six years.	
14	newsletter?		14	Q. Do you know when the	
15	A. No.		15	organization started?	
16	Q. And it's never had a		16	A. No, I don't know the exact	
17	newsletter?		17	date.	
18	A. No, but those are all things		18	Q. Okay. Who made her	
19	that are in the works.		19	president? She just said she's	
20	Q. Okay. And is there any list		20	president?	
21	anywhere in the world I can get of its		21	•	
				A. Well, she started the	
22	membership?		22	organization so	
23	A. Yes, I'm sure there is a		23	Q. Is she disabled?	
24	list and I'm not, you know		24	A. No, she's not but she was a	
25	Q. But you've never seen one?		25	caretaker. That's how she got into	
		Page 107			Page 109
1	A. I've heard the names		1	this.	
2	mentioned but I have never I've never		2	Q. Where does she live?	
3	seen the list, no.		3	A. Southern Florida,	
4	Q. Okay. So you've never seen		4	Philadelphia. She's living in	
5	the list. You don't know whether one		5	Philadelphia now, I think.	
6	exists?			· ·	
	·		6	Q. And how does she earn her	
7	A. Right.		7	money?	
8	Q. Okay. And how do you think		8	A. A variety of ways. Again,	
9	there's 18 or 19 other members? How do		9	she's been a caretaker most of her life.	
10	you think those people exist?		10	<ul><li>Q. And does she get paid by</li></ul>	
11	<ul> <li>A. Because I was sitting at a</li> </ul>			Disabled Detricts	
	A. Decause I was sitting at a		11	Disabled Patriots?	
12	meeting this past summer where the		11 12	A. No, no, no. No one's	
				A. No, no, no. No one's	
12	meeting this past summer where the applications were counted.		12	A. No, no, no. No one's getting paid by Disabled Patriots at	
12 13 14	meeting this past summer where the applications were counted. Q. Okay. Where did that		12 13 14	A. No, no, no. No one's getting paid by Disabled Patriots at this point.	
12 13 14 15	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place?		12 13 14 15	A. No, no, no. No one's getting paid by Disabled Patriots at this point.  Q. Okay. Does she get a cut of	
12 13 14 15 16	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer.		12 13 14 15 16	A. No, no, no. No one's getting paid by Disabled Patriots at this point.  Q. Okay. Does she get a cut of settlements or judgments from lawsuit	
12 13 14 15 16 17	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit		12 13 14 15 16 17	A. No, no, no. No one's getting paid by Disabled Patriots at this point. Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is	
12 13 14 15 16 17 18	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago?		12 13 14 15 16 17 18	A. No, no, no. No one's getting paid by Disabled Patriots at this point.  Q. Okay. Does she get a cut of settlements or judgments from lawsuit  A. No, not at all. This is really doing the work because we believe	
12 13 14 15 16 17 18 19	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So		12 13 14 15 16 17 18 19	A. No, no, no. No one's getting paid by Disabled Patriots at this point.  Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work.	
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12 13 14 15 16 17 18 19 20 21	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So it might have been early in the autumn or in the autumn.		12 13 14 15 16 17 18 19 20 21	A. No, no, no. No one's getting paid by Disabled Patriots at this point.  Q. Okay. Does she get a cut of settlements or judgments from lawsuit  A. No, not at all. This is really doing the work because we believe in the work.  Q. Okay. And are there any other officers of Disabled Patriots	
12 13 14 15 16 17 18 19 20 21 22	meeting this past summer where the applications were counted. Q. Okay. Where did that meeting take place? A. In Pittsburgh last summer. Q. And before your August visit to Chicago? A. No, it was after that. So it might have been early in the autumn or in the autumn. Q. Where was the meeting held?		12 13 14 15 16 17 18 19 20 21 22	A. No, no, no. No one's getting paid by Disabled Patriots at this point.  Q. Okay. Does she get a cut of settlements or judgments from lawsuit A. No, not at all. This is really doing the work because we believe in the work.  Q. Okay. And are there any	
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				1 11cd 03/00/2000 1 age 3 01 24	
		Page 110			Page 112
1	are?		1	there?	
2	A. No.		2	<ul> <li>A. It was mostly getting</li> </ul>	
3	<ul><li>Q. What other positions are</li></ul>		3	together so that I could talk to Maria.	
4	there beside president?		4	Q. Just so I'm clear, it was	
5	A. I'm		5	you, Ms. Gallagher, and you can't	
6	MR. BACON: Brain, I don't mean		6	identify anybody else who was there?	
7	to interrupt but if I can interject for		7	A. Correct.	
8	the record, Ms. Kramer herself is an		8	Q. Was anybody else there?	
9	officer and director of Disabled		9	A. Yes.	
10	Patriots.		10	Q. Are they members of the	
11	A. Right.		11	organization?	
12	MR. LEONARD: Counsel, I'm going		12	A. I don't know.	
13	to object to you coaching your witness.		13	Q. Was Mr. Bacon there?	
14	If you have an objection to make, fine		14	A. No.	
15	but you can't direct or provide		15	Q. Were any attorneys there?	
16	testimony to your witness. Okay. Our		16	A. No.	
17	rules don't allow it in the North		17	Q. Does Disabled Patriots have	
18	District of Illinois. I'm sure it's the		18	an office?	
19	same down in Florida.		19	A. There's they have a small	
20	Q. Ma'am, what other positions		20	office right now in Southern Florida.	
21	are there besides president within this		21	Q. What town?	
22	organization?		22	A. I don't know.	
23	A. I'm a director and		23	Q. No idea?	
24	vice-president.		24	A. Hm-hm.	
25	Q. Okay. Why is it when I		25	Q. You have to say yes or no.	
2.5	Q. Okay. Willy is it writer I		ر ح	Q. Tou have to say yes of ho.	
		Page 111			Page 113
1	asked you before about the other		1	A. No, if I have to reach Maria	-
2	officers, you had no idea what I was		2	Gallagher, I usually call her by phone.	
3	talking about? Now, as your attorney		3	Q. Well, how do you know they	
4	says that you're a vice-president,		4	have an office?	
5	you're telling me you're a		5	A. Because I know we have	
6	vice-president?		6	discussed that.	
7	A. I thought you were talking		7	Q. You've never been there,	
8	about people other than me, sir.				
	CONTRACTOR COLOR C		8		
ı.	• •		8	right?	
9	Q. I said other than Maria		9	right?  A. No, I have not.	
9 10	Q. I said other than Maria Gallagher.		9 10	right? A. No, I have not. Q. What town is it in?	
9 10 11	Q. I said other than Maria Gallagher. A. Okay. I'm an officer.		9 10 11	right? A. No, I have not. Q. What town is it in? A. I don't know.	
9 10 11 12	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been		9 10 11 12	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at	
9 10 11 12 13	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer?		9 10 11 12 13	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time?	
9 10 11 12 13 14	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past		9 10 11 12 13 14	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an	
9 10 11 12 13 14 15	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting.		9 10 11 12 13 14 15	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine.	
9 10 11 12 13 14 15 16	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting?		9 10 11 12 13 14 15 16	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it?	
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9 10 11 12 13 14 15 16 17	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were		9 10 11 12 13 14 15 16 17	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what	
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9 10 11 12 13 14 15 16 17 18 19 20	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six.		9 10 11 12 13 14 15 16 17 18 19 20	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address	
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9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there? A. I don't remember exactly who was there. Q. So it was you, Ms. Gallagher		9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location. Q. You're a vice-president and director of the organization and you have no idea where their office is	
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. I said other than Maria Gallagher. A. Okay. I'm an officer. Q. And how long have you been an officer? A. It was decided this past at this past meeting. Q. At the Pittsburgh meeting? A. Yes. Q. Okay. How many people were at the Pittsburgh meeting? A. Five or six. Q. Who was there? A. I don't remember exactly who was there.		9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	right?  A. No, I have not. Q. What town is it in? A. I don't know. Q. Who is physically present at the office at any time? A. There's a phone and an answering machine. Q. That's it? A. Yep. Q. Okay. And do you know what the address location is? A. I don't know the address location. Q. You're a vice-president and director of the organization and you	

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		Page 114			Page 116
1	A. I don't have it on me. I		1	A. You know what, I don't know.	
2	can find it out for you. I have it at		2	I don't remember.	
3	home.		3	Q. Are there any other	
4	Q. But there's no employees who		4	directors?	
5	report there for business, right?		5	A. I don't remember.	
6	A. No, there are no employees.		6	Q. And how did you become a	
7	Q. And, in fact, none of the		7	director and vice-president? Maria	
8	members of the organization live in this		8	Gallagher said you're going to be a	
9	town, right?		9	director and vice-president?	
10	A. Maria Gallagher mostly has		10	A. No, no, no, but I've been	
11	only resided away from there for a brief		11	active in this organization, in terms of	
12	time this year and I think she's back		12	doing a lot of work.	
13	residing there again now.		13	Q. Well, I understand that.	
14	Q. Okay. And there's no		14	But before July or August of 2007, you	
15	business conducted in this office, is		15	weren't a director and vice-president,	
16	there?		16	right?	
17	A. Not right now.		17	A. That is correct.	
18	Q. And there never has been,		18	Q. And when you went to this	
19	correct?		19	meeting with you and Maria Gallagher	
20	A. No, but there will be.		20	present, who said that Ms. Kramer's now	
21	Q. How long has the organization		21	a director and vice-president?	
22	had this office?		22	A. She asked me would I like to	
23	A. I think a short time.		23		
24			24	and I said yes.	
25	Q. Well, what does that mean, a week?		25	Q. Ms. Gallagher did?	
	week!		23	A. Yes.	
		Page 115			Page 117
1	A. No, no, no, months.		1	Q. So that's how you became	
			1 -	q. or mare non you became	
2	Q. A couple months?		2	that title?	
3	<ul><li>Q. A couple months?</li><li>A. Yes.</li></ul>				
			2	that title?	
3 4	A. Yes.		2	that title? A. Correct. Q. Anybody else who holds a	
3	A. Yes. Q. And how do they pay for the		2 3 4	that title? A. Correct.	
3 4 5	A. Yes. Q. And how do they pay for the office?		2 3 4 5	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you	
3 4 5 6	A. Yes. Q. And how do they pay for the office? A. I don't know.		2 3 4 5 6	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?	
3 4 5 6 7	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your		2 3 4 5 6 7	that title? A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now.	
3 4 5 6 7 8	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office?		2 3 4 5 6 7 8	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization	
3 4 5 6 7 8 9	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your		2 3 4 5 6 7 8 9	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization Paralyzed Veterans, is it incorporated	
3 4 5 6 7 8 9 10	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from		2 3 4 5 6 7 8 9 10	that title?  A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?	
3 4 5 6 7 8 9 10 11	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is		2 3 4 5 6 7 8 9 10 11 12	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is.	
3 4 5 6 7 8 9 10 11 12 13	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this		2 3 4 5 6 7 8 9 10 11 12 13	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where?	
3 4 5 6 7 8 9 10 11 12 13 14	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the		2 3 4 5 6 7 8 9 10 11 12 13 14	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida.	
3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was,		2 3 4 5 6 7 8 9 10 11 12 13 14 15	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?  A. Yes, it is.  Q. Where?  A. In Southern Florida.  Q. How long has it been	
3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?  A. Yes, it is.  Q. Where?  A. In Southern Florida.  Q. How long has it been incorporated?	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fund-		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years.	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization,		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Correct. Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher? A. I believe that there are but I can't give you names right now. Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere? A. Yes, it is. Q. Where? A. In Southern Florida. Q. How long has it been incorporated? A. Several years. Q. Okay. And the documents that show it's incorporated, those types	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee?		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?  A. Yes, it is.  Q. Where?  A. In Southern Florida.  Q. How long has it been incorporated?  A. Several years.  Q. Okay. And the documents that show it's incorporated, those types of things?	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee? A. Right.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?  A. Yes, it is.  Q. Where?  A. In Southern Florida.  Q. How long has it been incorporated?  A. Several years.  Q. Okay. And the documents that show it's incorporated, those types of things?  A. Hm-hm.	
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. And how do they pay for the office? A. I don't know. Q. You're the vice-president and director, you don't know how your organization pays for their office? A. I'm telling you that there's a small amount of income from reinspections of properties and that is all the monies that there are in this organization. Although we do have the status to accept donations and that was, again, part of the reason for this meeting in the fall to talk about fundraising for the organization. Q. But the organization, Disabled Patriots, has no employee? A. Right. Q. It has at least two		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	that title?  A. Correct.  Q. Anybody else who holds a title in this organization besides you and Ms. Gallagher?  A. I believe that there are but I can't give you names right now.  Q. Is the group or organization Paralyzed Veterans, is it incorporated anywhere?  A. Yes, it is.  Q. Where?  A. In Southern Florida.  Q. How long has it been incorporated?  A. Several years.  Q. Okay. And the documents that show it's incorporated, those types of things?  A. Hm-hm.  Q. Where are those documents	
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	Pa	ige 118			Page 120
1	A. Yes, I'm sure.	·	1	Q. So you think there's by-laws	J
2	Q. You don't know, do you?		2	but you've never seen them, right?	
3	A. No, I'm fairly certain that		3	A. Yes.	
4	they are maintained there.	I	4	Q. And you think they're	
5	Q. Has it ever been incorporated	I	5	incorporated but you've never seen those	
6	anywhere else besides Florida?		6	papers?	
7	A. I'm not certain.		7	A. Correct.	
8	Q. Is it in good standing to				
9			8	Q. Okay. And the organization	
	conduct business in the State of	1	9	has at least two officers, you and	
10	Florida?		.0	Gallagher, right?	
11	A. Yes, it is.		.1	A. Correct.	
12	Q. How do you know that?		.2	Q. It has no employees?	
13	A. Because I know it for a fact		.3	A. Correct.	
14	we had a meeting not very long ago, a	1	.4	<ul><li>Q. And the only money it takes</li></ul>	
15	teleconference, which was a for the	1	.5	in is if it's involved in a lawsuit or	
16	purposes of maintaining the legal status	1	.6	a settlement and the monies from that?	
17	in Southern Florida.	•	.7	A. Correct.	
18	Q. I don't understand. You had	t t	.8	Q. And who decides what	
19	a meeting to discuss whether you're		9	percentage of those monies the	
20	going to maintain legal status?		20	organization gets versus the attorneys,	
21	A. No, no, no, no. It was		21	like Mr. Bacon or somebody else gets?	
22			22		
23	a meeting to comply with what was			A. Well, the attorneys get paid	
	requested by the articles of			whatever the agreement is.	
24	incorporation.		24	Q. The agreement between who?	
25	Q. There are articles of	2	25	A. Between the defendants and	
	Pac	ge 119			Page 121
1		ge 119	1	the attorneys.	Page 121
1 2	incorporation?	į :	1 2	the attorneys.  O So if the Disabled Patriots	Page 121
2	incorporation?  A. Yes.		2	Q. So if the Disabled Patriots	Page 121
2 3	incorporation? A. Yes. Q. Is that yes?		2 3	Q. So if the Disabled Patriots has no say	Page 121
2 3 4	incorporation? A. Yes. Q. Is that yes? A. Yes.		2 3 4	Q. So if the Disabled Patriots has no say A. They work that out. No.	Page 121
2 3 4 5	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those		2 3 4 5	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes	Page 121
2 3 4 5 6	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained?		2 3 4 5 6	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys	Page 121
2 3 4 5 6 7	incorporation? A. Yes. Q. Is that yes? A. Yes. Q. And where are those maintained? A. I'm sure with Mrs. Gallagher.		2 3 4 5 6 7	Q. So if the Disabled Patriots has no say A. They work that out. No. Q how much the money goes to the attorneys A. No.	Page 121
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them anything?  A. No. No, no, no, no.  Q. Do they pay Disabled Patriots anything?  A. No. Q. Do they pay Disabled Patriots anything?  A. No. Q. Do they pay Disabled Patriots anything?  A. No. Q. So the only one to get money through these lawsuits but the attorneys organization?  A. That is correct. Q. Okay. Organization?  A. That is correct. Q. Okay. A. Again, not to my awareness. Q. Okay. A. Again, not to my awareness. Q. Okay. A. Again, not to my awareness. Q. Okay. A. I think they have a bank accounts? A. I think they have a bank account, yes. A. If money is recovered, who gets it? A. If money is recovered, it's up to the attorneys. The attorneys get it. Q. So you don't get anything? A. No. Q. Okay. The attorneys get it. Q. So you don't get anything? A. No. Q. And in all these cases you've been involved in, has a settlement agreement ever provided for or the judgement ever provided for Disabled Patriots to receive any money? A. No. A. Again, not to my awareness. Q. Okay. And does Disabled 11 Patriots have any bank accounts? A. I think they have a bank account, yes. A. In Southern Florida. Q. You've never seen any documents showing the bank account? A. In a I have not. Q. And why do you think they have a bank account? A. Because they do business, some business. There's a phone bill being paid. Q. So you think the monies got to come from somewhere?				-5		
them anything?  3			Page 122			Page 124
3 A. No. No, no, no, no. 4 Q. Do they pay Disabled Patriots 5 anything? 6 A. No. 7 Q. So the only one to get money 8 through these lawsuits but the attorneys 9 don't give any of the money to your 10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 19 a. No. 20 You don't get anything? 21 A. No. 22 Q. You personally, the 25 A. Nothing. 26 Q. Visually of the attorney of the way and they of the attorney of the your organization, Disabled Patriots, would 26 get site; 27 A. Nothing. 28 A. Precisely. 29 Q. Okay. And there's no 29 Gets great from in Illinois and Disabled 20 Q. Not you don't get anything? 21 A. No. 22 Q. You personally, the 25 A. Nothing. 26 Q. Visually of your think they 27 A. Recause they do business, 28 get nothing? 29 A. That is correct. 20 Q. Okay. And there's no 21 a. A. Precisely. 21 Q. Okay. And there's no 22 greement between Mr. Bacon's firm or 23 the other firm in Illinois and Disabled 24 Patriots, is there? 25 A. That is correct. 26 Q. Okay. And there's no 27 G. Where is it located? 28 A. It show have a bank account? 29 A. If a tatorneys get 20 Q. So you don't get anything? 21 A. Ro. 22 Q. You personally, the 23 don't give any of the autorneys decide 25 they wanted to give some money as a 26 gift? 27 A. Precisely. 28 Q. Unless the attorneys decide 29 they wanted to give some money as a 29 gift? 29 Q. Okay. And there's no 20 Cokay. Who would have access to to come from somewhere? 20 to come from somewhere? 21 A. Rot to my awareness. 29 Q. Not ye make the very given a 29 A. Not to my awareness. 20 Q. So all these suits you've 21 A. Not to my awareness. 21 A. Not to my awareness. 22 D. Okay. And have per portion to the lawyer 23 been involved in, has a settlement agreement ever provided for 29 A. That is attement town wareness. 29 A. Not to my awareness. 29 C. Okay. Who would have access to to come from some	1	<ul> <li>Q. Does Disabled Patriots pay</li> </ul>		1	A. That is correct.	J
A. No. No, no, no, no.  4 Q. Do they pay Disabled Patriots 5 anything? 6 A. No. 7 Q. So the only one to get money 8 through these lawsuits but the attorneys 9 don't give any of the money to your 10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 19 a organization, Disabled Patriots, would 20 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the 25 A. Nothing.  Page 123  1 Q. Unless the attorneys decide 2 they wanted to give some money as a 3 gift? 4 A. Precisely. 5 Q. Okay. And there's no 6 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. Okay. And there's no 11 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. Okay. And there's no 11 agreement between Mr. Bacon's firm or 12 the other firm in Illinois and Disabled 13 Patriots bave any bank account? 14 A. Yes. 15 Q. Vou've never seen any 16 money? 17 A. Not to my awareness. 18 Q. Vau don't get anything? 28 A. Not beyond what I've 29 A. That is correct. 20 Q. Okay. And there's no 20 D. Okay. And there's no 21 A. Not to my awareness. 22 Q. Okay. And there's no 23 greement with Disabled Patriots and the 24 agreement with Disabled Patriots and the 25 account, yes. 26 A. In Southern Florida. 27 A. B. C. So you think the monies got 28 be an involved in, nine ye and the patriots have any 29 A. Rot to my awareness. 20 Q. Okay. And does Disabled 21 A. I think they have a bank 21 A. I think they have any and account? 22 A. Not beyond what I've 23 been involved in, hard ye never given a 24 protection of the submer of the protection of the lawyer 25 possible that they might have some money 26 to your organization? 27 A. Not to my awareness. 28 Q. Okay. And has Disabled 29 Patriots ever given or paid any money 20 to	2	them anything?		2	Q. And in all these cases	
4 Q. Do they pay Disabled Patriots 5 anything? 6 A. No. 7 Q. So the only one to get money through these lawsuits but the attorneys don't give any of the money to your organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 10 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the organization, Disabled Patriots, would def et ewanted to give some money as a 3 gift? 4 A. Precisely. Q. Okay. And these Disabled 22 they wanted to give some money as a 3 gift? 4 A. Precisely. Q. Okay. And there's no a greement between Mr. Bacon's firm or the other firm in Illinois and Disabled 8 Patriots, is there? Q. And there's never an a greement twith Disabled Patriots and the a attorneys in any of these cases, right? A. That is correct. Q. And there's never an 11 agreement with Disabled Patriots and the a attorneys in any of these cases, right? A. Not to my awareness. Q. Okay. And has Disabled 15 Patriots ever paid an attorney any money? A. Not to my awareness. Q. So all these suits you've 20 A. Not to my awareness. Q. So all these suits you've 21 A. Not to my awareness. Q. So all these suits you've 22 any knowledge that they have a bank account; A. I have not. Q. And why do you think they 12 documents showing the bank account? A. I have not. Q. And why do you think they 14 A. Right. Q. So you think the monies got 15 to come from somewhere? 16 A. Right. Q. Okay. Who would have access 17 to that account? A. Right. Q. Okay. Who would have access 18 Q. Okay. And does Disabled Patriots have any bank accounts? A. I have not. Q. And why do you think they 18 documents showing the bank account? A. I have not. Q. And why do you 18 A. I have not. Q. And why do you think they 19 a A. Right. Q. Okay. Who would have access 10 A. Right. Q. Okay. And does Disabled Patriots have any any 10 A. Not. Does Disabled Patriots, the author of the lawer 11 A. Not	3	A. No. No, no, no, no.		3		
5 anything? 6 A. No. 7 Q. So the only one to get money 8 through these lawsuits but the attorneys 9 don't give any of the money to your 10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 20 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the 23 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  16 Q. Vay. Who would have access 17 Q. Okay. And there's no 18 up to the attorneys decide 19 they wanted to give some money as a 19 gift? 10 Q. Unless the attorneys decide 11 Q. Unless the attorneys decide 12 they wanted to give some money as a 13 gift? 1 Q. Unless the attorneys decide 1 Q. Okay. And there's no 1 agreement between Mr. Bacon's firm or 1 the other firm in Illinois and Disabled 1 A. That is correct. 10 Q. And there's never an 1 agreement with Disabled Patriots and the 1 attorneys in any of these cases, right? 1 A. That is correct. 1 Q. Okay. And has Disabled 1 Patriots have any bank accounts? 1 A. Is in Southern Florida. 2 Q. Okay. And there's no 2 Q. You personally, the 2 Q. So you think the monies got 2 to come from somewhere?  1 A. Right. 2 Q. Okay. Who would have access 2 Q. Okay. And there's no 3 gift? 4 A. Precisely. 5 Q. Okay. And there's no 6 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. Okay. And has Disabled 11 A. Right. 2 Q. Okay. And does Disabled 12 A. Rot to my awareness. 13 gift? 4 A. Precisely. 5 Q. Okay. And there's no 6 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 19 Patriots besides — well, strike that. 10 Does Disabled Patriots in the attorney any 11 agreement with Disabled Patriots and the 12 attorneys in any of these cases, right? 18 A. Not to my awareness. 19 Q. Okay. And does Disabled 19 Patriots besides — well, strike that. 10 Does Disabled Pat	4	Q. Do they pay Disabled Patriots		4	•	
6 A. No. 7 Q. So the only one to get money 8 through these lawsuits but the attorneys 9 don't give any of the money to your 10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 19 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  Page 123  1 Q. Unless the attorneys decide 2 they wanted to give some money as a 3 gift? 4 A. Precisely. 5 Q. Okay. And there's no 3 greement between Mr. Bacon's firm or 17 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. And there's nove a greement between my. Bacon's firm or 17 the other firm in Illinois and Disabled 18 Patriots, is there? 19 A. That is correct. 10 Q. Okay. And hase Disabled 11 agreement between with Disabled Patriots and the 12 attorneys in any of these cases, right? 17 A. Not to my awareness. 18 Q. Okay. 19 A. A. Again, not to my awareness. 10 Q. Okay. And does Disabled 11 A. I think they have a bank account; 10 Q. Where is it located? 11 A. I fink they have a bank account; 11 A. I fink they have a bank account; 12 A. I have not. 13 account; 14 Q. Vou've never seen any 15 documents showing the bank account? 16 Q. You've never seen any 17 documents showing the bank account? 18 A. I have not. 19 in Linumphore or a phone bill 19 in Linumphore or a phone bill 20 be partial adjusted to come from somewhere?  Page 123  1 A. Right. 2 Q. Okay. Who would have access to that account? 2 A. Not omy awareness. 2 Q. Okay. And hase Disabled 2 they wanted to give some money any 2 of the other firm in Illinois and Disabled 3 patriots, is there? 3 A. That is correct. 4 A. Not to my awareness. 5 Q. Has Mr. Bacon or the lawyer 19 in Illinois ever given or paid any money 10 to your organization? 11 A. Not to my awareness. 12 Q. Okay. But you don't have 13 account; 2 A. Not bey one what I've 2 described which is reinspection fees on 14 prop	5			5		
8 through these lawsuits but the attorneys don't give any of the money to your organization? 10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who gets it? 17 A. If money is recovered, it's up to the attorneys. The attorneys get it. 18 up to the attorneys. The attorneys get it. 19 it. 20 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the organization, Disabled Patriots, would get nothing? 25 A. Nothing.  Page 123 1 Q. Unless the attorneys decide they wanted to give some money as a gift? 4 A. Precisely. 5 Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots and the attorneys in any of these cases, right? 26 A. That is correct. 27 Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? 28 A. That is correct. 4 Q. A. That is correct. 5 Q. Okay. And does Disabled Patriots and the attorneys in any of these cases, right? 19 A. That is correct. 10 Q. And there's never an agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots and the attorneys in any of these cases, right? 3 A. That is correct. 4 Q. Okay. And has Disabled Patriots and the attorneys in any of these cases, right? 4 A. That is correct. 5 Q. Okay. And has Disabled Patriots and the attorneys in any of these cases, right? 4 A. That is correct. 5 Q. Okay. And has Disabled Patriots and the attorneys in any of these cases, right? 4 A. Not to my awareness. 6 Q. Okay. And has Disabled Patriots and the attorneys in any of these cases, right? 6 A. Yes. As the best of my knowledge, yes. 7 A. Not beyond what I've described which is reinspection fees on properties. 8 Q. Okay. And othere's now agreement with Disabled Patriots and the attorneys in any of these cases, right? 9 A. Not to my awareness. 9 Q. Okay. And ones Disabled Patriots and the attorneys in any of these cases, right? 9 A. Not to my awareness. 10 Q. Okay. But y		· · ·				
through these lawsuits but the attorneys don't give any of the money to your organization?  A. That is correct.  Q. Okay. So like in this suit that we're involved in now?  A. Yes. Q. If money is recovered, who gets it? A. If money is recovered, it's up to the attorneys. The attorneys get lit. Q. So you don't get anything? A. No. Q. So you don't get anything? A. No. Q. You personally, the organization, Disabled Patriots, would get nothing.  Page 123  Q. Unless the attorneys decide they wanted to give some money as a gift? Q. Unless the attorneys decide they wanted to give some money as a gift? Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? A. That is correct. Q. And there's never an agreement with Disabled Patriots and the attorneys in any of these cases, right? A. That is correct. Q. Okay. And has Disabled Patriots ever peal an attorney any money? A. Not to my awareness. Q. Osay. But you don't have any lowed in, now? A. Again, not to my awareness. Q. Okay. And does Disabled Patriots have any bank accounts? A. I hink they have a bank account, yes. A. In Southern Florida. Q. Where is it located? Q. You perver seen any documents showing the bank account? A. I have not. B. Q. And why do you think they Bacuments showing the bank account? A. Because they do business. B. A. Right. B	7	Q. So the only one to get money		7		
9 A. Again, not to my awareness. 10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys get it. 19 Q. So you don't get anything? 10 query organization, Disabled Patriots, would 11 Q. Unless the attorneys decide 12 they wanted to give some money as a gift? 11 Q. Unless the attorneys decide 12 they wanted to give some money as a gift? 13 Q. Okay. And there's no 15 Q. Okay. And there's no 16 agreement between Mr. Bacon's firm or 17 the other firm in Illinois and Disabled 18 Patriots, is there? 19 A. That is correct. 19 A. Right. 10 Q. Okay. Who would have access of my 11 A. Right. 12 A. Right. 13 A. Right. 14 A. Precisely. 25 Q. Okay. And there's no 26 agreement between Mr. Bacon's firm or 17 the other firm in Illinois and Disabled 18 Patriots, is there? 19 A. That is correct. 10 Q. And there's never an 11 agreement with Disabled Patriots and the 12 attorneys in any of these cases, right? 15 Patriots ever paid an attorney any 16 money? 17 A. Not to my awareness. 28 Q. Okay. And has Disabled 19 patriots ever paid an attorney any 19 in Illinois ever given or paid any money 10 to vour organization? 29 A. Not to my awareness. 20 Q. Say all these suits you've 21 A. Not own awareness. 22 Q. Okay. But you don't have 23 an incived back to Disabled Patriots; is 24 A. No. 25 Okay. But you don't have 26 been involved in, they've never given a 27 incived in, they've never given a 28 incived back to Disabled Patriots; is	8			8		
10 organization? 11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 20 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the 23 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  Page 123  1 Q. Unless the attorneys decide 2 they wanted to give some money as a gift? 4 A. Precisely. 5 Q. Okay. And there's no agreement between Mr. Bacon's firm or the other firm in Illinois and Disabled Patriots, is there? 9 A. That is correct. 10 Q. And there's no agreement with Disabled Patriots and the attorneys in any of these cases, right? 11 Q. Okay. And has Disabled Patriots ever piad an attorney any money? 11 A. Not to my awareness. 12 Q. Okay. And has Disabled Patriots ever piad an attorney any money? 15 A. Not to my awareness. 16 Q. Okay. But you don't have a bank account? 17 A. Not to my awareness. 18 A. That is correct. 19 In Illinois ever given or paid any money to your organization? 19 In Illinois ever given or paid any money to your organization; 20 Q. Okay. But you don't have any assets at all, do you, ma'am? 21 A. Not to my awareness. 22 Q. Okay. But you don't have any noney to you ma'ner given a nickel back to Disabled Patriots; is		- ·		I .	•	
11 A. That is correct. 12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 19 Q. So you don't get anything? 21 A. No. 22 Q. You'personally, the 23 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  16 Q. Unless the attorneys decide 26 they wanted to give some money as a 3 gift? 4 A. Precisely. 5 Q. Okay. And there's no 6 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. And there's never an 11 agreement with Disabled Patriots and the 12 attorneys in any of these cases, right? 13 A. Not to my awareness. 14 Q. Okay. And has Disabled 15 A. In Southern Florida. 9 Q. You've never seen any 16 do Q. You've never seen any 17 documents showing the bank account? 18 A. I have not. 19 Q. And why do you think they 19 have a bank account? 10 Q. And why do you think they 19 have a bank account? 10 A. Roesuse they do business, 20 some business. There's a phone bill 21 being paid. 22 Q. So you think the monies got 23 to come from somewhere? 24 D. Okay. And there's no 25 to that account? 26 A. Precisely. 27 A. Maria Gallagher. 28 Q. Okay. And dhere's nover an 29 A. That is correct. 29 A. That is correct. 30 Q. And there's never an 31 agreement with Disabled Patriots and the 31 account, yes. 31 A. In A in ye never seen any 4 A. Right. 3 A. In have not. 3 A. In a because they do business, 3 some business. There's a phone bill 3 being paid. 4 Q. So you think the monies got 4 A. Regall and account? 4 A. Regall and account? 5 Q. Okay. Who would have access 5 Q. Okay. And does Disabled 6 Patriots besides well, strike that. 6 Does Disabled Patriots have any 18 A. In a bank account? 19 A. Rot to my awareness. 10 Q. Okay. And has Disabled 11 aprice in Illinois ever given or paid any money 10 to your organization? 11 and Right 12 A. Right 13 A. Right 14 A. Right 15 A. Right 16 Q. Okay. And				1		
12 Q. Okay. So like in this suit 13 that we're involved in now? 14 A. Yes. 15 Q. If money is recovered, who 16 gets it? 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 10 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the 23 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  Page 123  1 Q. Unless the attorneys decide 2 they wanted to give some money as a 3 gift? 4 A. Precisely. 5 Q. Okay. And there's no 6 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. And there's never an 11 agreement with Disabled Patriots and the 12 attorneys in any of these cases, right? 13 A. Not to my awareness. 14 Q. Okay. And has Disabled 15 A. In Southern Florida. 2 Q. You personally, the 3 Q. You personally, the 4 A. I have not. 19 Q. And why do you think they 20 have a bank account? 21 A. Because they do business, some business. There's a phone bill 23 being paid. 24 Q. So you think the monies got 25 to come from somewhere? 25 to come from somewhere? 26 to way. And there's no 27 A. Natria Gallagher. 28 Q. Okay. And there beet of my 29 knowledge, yes. 29 A. That is correct. 20 Q. And there's never an 20 agreement with Disabled Patriots and the 21 attorneys in any of these cases, right? 21 A. Not to my awareness. 22 Q. Has Mr. Bacon or the lawyer 23 in Illinois ever gaid an attorney any 24 noney? 25 A. Not to my awareness. 26 Q. So you think they 27 have a bank account? 28 A. I have not. 29 have a bank account? 20 have a bank account? 20 have a bank account? 21 A. R. Recause they do business, some business. There's a phone bill 22 being paid. 23 being paid. 24 Q. So you think they 25 to come from somewhere? 26 to come from somewhere? 27 A. Ratios count? 28 A. Recause they do would have access to the account? 29 A. Naria Gallagher. 20 Q. Okay. And does Disabled 20 patriots besides — well, strike that. 21 Does Disabled Patriots have any 22 assets at all? 23 A. Not beyond what I've 24 A. N		<del>-</del>				
that we're involved in now?  14						
14 A. Yes. 15 Q. If money is recovered, who gets it? 17 A. If money is recovered, it's 16 Q. You've never seen any 17 documents showing the bank account? 18 up to the attorneys. The attorneys get 18 A. In Southern Florida. 19 Q. And why do you think they 19 Q. And whith yo you you think they 19 Q. And who yo you think they 19 Q. And where's not 20 you think the monies got 10 you whith they 19 Q. Okay. And there's not 20 you whith the monies got 10 you whith they 20 have a bank account? 21 A. Not only a wareness 10 you whith they are a bank account? 22 A. Not only awareness 10 your organization? 23 being paid. 24 Q. Os you think they and a bank account? 24 A. Right. 25 A. Right. 26 Q. Okay. Who would have access 10 to that account? 27 A. Maria Gallagher. 28 Q. Okay. Who would have access 10 to that account? 29 A. That is correct. 29 Q. Okay. And does Disabled 20 Patriots, is there? 30 Q. Okay. And does Disabled 21 patriots have any 20 your your your your your your your your	1					
15 Q. If money is recovered, who 16 gets it?  A. If money is recovered, it's 17  A. If money is recovered, it's 17  B. up to the attorneys. The attorneys get 18  It. 19  Q. So you don't get anything? 20  Q. So you don't get anything? 21  A. No. 21  Organization, Disabled Patriots, would 23  get nothing? 25  A. Nothing. 26  Page 123  Q. Unless the attorneys decide 25  they wanted to give some money as a 3 gift? 3  A. Precisely. 4  A. Precisely. 5  Q. Okay. And there's no 3 agreement between Mr. Bacon's firm or 4 the other firm in Illinois and Disabled Patriots, is there? 9  A. That is correct. 9  A. That is correct. 10  Q. And there's never an 3 agreement with Disabled Patriots and the 3 attorneys in any of these cases, right? 4  A. That is correct. 19  Q. Okay. And has Disabled 15  Patriots ever paid an attorney any money? 17  A. Not to my awareness. 18  Q. Has Mr. Bacon or the lawyer in Illinois ever given an nickel back to Disabled Patriots; is 4. No. 19  A. Not to my awareness. 20  Q. So you don't get anything? 20  A. Not to my awareness. 21  Q. Unless the attorneys get in a documents showing the bank account? 4. I have not. 20  A. I have not. 19  A. A. Because they do business. There's a phone bill 20  bein paid. 24  Q. So you think the monies got 20  The A. Right. 20  A. A. Right. 20  A. A. Right. 20  A. Na Right. 20  A. Maria Gallagher. 20  Q. Okay. And does Disabled 30  A. You of why do you think they in the have any assets at all? 10  A. Not beyond what I've 10  A. Not beyond what I've 11  A. They might have some money 11  A. They might have some money 11  A. They might have been some donations that I'm 19  not aware of. 20  Q. Okay. But you don't have 21  and knowledge that they have any assets 22  at all, do you, ma'am? 24  A						
16 Q. You've never seen any 17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 19 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the 23 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  26 Q. Unless the attorneys decide 27 they wanted to give some money as a 28 gift? 29 Q. Okay. And there's no 29 agreement between Mr. Bacon's firm or 29 the other firm in Illinois and Disabled 20 Patriots, is there? 21 A. That is correct. 22 Q. Okay. And does Disabled 23 patriots, is there's 24 A. That is correct. 25 A. That is correct. 26 Q. Okay. And has Disabled 27 Patriots ever paid an attorney any 28 money? 29 A. Not to my awareness. 29 Q. Has Mr. Bacon or the lawyer in Illinois ever given an not word or your organization? 20 Cokay. But you don't have a bank account? 21 A. Because they do business, some business. There's a phone bill bein paid. 22 been involved in, they've never given a nickel back to Disabled Patriots; is 20 And why do you think they 21 A. Because they do business, some business. There's a phone bill bein paid. 22 born business. There's a phone bill bein paid. 23 bein paid. 24 Q. So you think the monies got to come from somewhere?  25 to come from somewhere?  26 A. Right. 27 Q. Okay. Who would have access to that account? 28 A. Maria Gallagher. 29 Q. Only her? 40 A. Yes. As the best of my thouledge, yes. 41 A. Net best of my thouledge, yes. 42 Q. Okay. And does Disabled Patriots have any assets at all? 43 assets at all? 44 A. Not beyond what I've described which is reinspection fees on properties. 45 Q. Well, according to you, it's not aware of. 46 A. They might have some money in a bank account; right? 47 A. Right. 49 A. Right. 40 A. Right. 41 A. Right. 41 A. Right. 42 Q. Okay. And does Disabled Patriots have any assets at all? 41 A. There might have some meny in a bank account; in a bank account; in a bank account; in a bank account; in a bank account? 40 A. Not to my awareness. 41 A. There might have any assets at all? 41 A. There might						
17 A. If money is recovered, it's 18 up to the attorneys. The attorneys get 19 it. 19						
18 up to the attorneys. The attorneys get 19 it. 10 Q. So you don't get anything? 21 A. No. 22 Q. You personally, the 23 organization, Disabled Patriots, would 24 get nothing? 25 A. Nothing.  26 Q. Unless the attorneys decide 27 they wanted to give some money as a 3 gift? 4 A. Precisely. 5 Q. Okay. And there's no 6 agreement between Mr. Bacon's firm or 7 the other firm in Illinois and Disabled 8 Patriots, is there? 9 A. That is correct. 10 Q. And there's nover an 11 agreement with Disabled Patriots and the 12 attorneys in any of these cases, right? 13 A. That is correct. 14 Q. Okay. And has Disabled 15 Page 123 1 A. Not to my awareness. 16 Q. Has Mr. Bacon or the lawyer 17 A. Not to my awareness. 18 Q. Has Mr. Bacon or the lawyer 19 in Illinois ever given or paid any money 10 to your organization? 21 A. Not to my awareness. 22 Q. So you think they 23 been invised in the year any any 24 Q. So you think they 25 been invised in the year any any 26 D. So you think they 27 A. Right. 28 Q. Okay. Who would have access 29 Q. Only her? 30 to that account? 4 A. Right. 4 A. Right. 5 Q. Only her? 4 A. Maria Gallagher. 5 Q. Only her? 6 A. Yes. As the best of my 6 knowledge, yes. 9 Page 123 1 A. Right. 2 Q. Okay. Who would have access 1 to that account? 1 A. Not beet of my 1 A. Not beet of my 1 knowledge, yes. 1 Does Disabled Patriots have any 2 assets at all? 2 A. Not beyond what I've 2 A. Not been some donations that I'm 2 A. Not to my awareness. 3 G. Okay. But you don't have 3 at all, do you, ma'am? 4 A. No.  1 A. Right. 4 A. Right. 5 Q. Okay. Who would have access 5 to that account? 6 A. Yes. As the best of my 8 knowledge, yes. 9 Page 123 1 A. Not beet of my 1 A. Yes of have a managed in the partiots beet of my 1 assets at all? 2 A. Not been some donations that I'm 2 Okay. But you don't have 2 Okay. Mad been some money any 3 to that account?  4 A. Precisely.  5 Q. Okay. But you don't have 2 any knowledge that they have any assets 2 at all, do you, ma'am? 2 A. No.						
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		Page 126			Page 128
1	sitting here under oath today, you're		1	A. I can't I don't know.	
2	not aware of anything that Disabled		2	Q. Okay. Who is it that	
3	Patriots possesses or owns, correct?		3	decided that Mr. Bacon and the attorney	
4	<ul><li>A. That is correct.</li></ul>		4	in Illinois should be the lawyers for	
5	<ul> <li>Q. Does the organization even</li> </ul>		5	Disabled Patriots in this case?	
6	own a cell phone or anything like that?		6	A. I don't know.	
7	A. They have a phone. I know		7	Q. You have no idea?	•
8	they do.		8	A. Um-um.	
9	Q. Well, is it just a phone		9	O. Is that a no?	
10	that happens be in the office or is it		10	A. No. I know I've worked with	
	• •		ŀ		
11	a cell phone?		11	Mr. Bacon a few times and	
12	A. No, it's a phone in the		12	Q. Well, ma'am, you're the	
13	office.		13	plaintiff in this case, you understand	
14	Q. So they don't own that,		14	that, right?	
15	that's just part of the rental		15	A. Yes.	
16	agreement?		16	Q. Okay. And Mr. Bacon, he	
17	A. I don't know.		17	doesn't represent you personally, does	
18	Q. Okay. Is there any		18	he?	
19	furniture, desk, anything at all in this		19	A. No.	
20	office space you've been talking about?		20	Q. He just represents Disabled	
21	A. Well, it's not an empty		21	Patriots?	
22	space so and I can't tell what's in		22	A. Yes, but he	
23	the space. I've never seen it.		23	Q. Who at Disabled Patriots	
24	Q. You've never been there?		24		
	<del>-</del> .		ı	retained him and the guy in Illinois to	
25	A. Not yet.		25	be their attorneys for this case?	
		Page 127			Page 129
1	Q. And no one's ever described	Page 127	1	A. I don't know how the	Page 129
1 2	Q. And no one's ever described it to you?	Page 127			Page 129
2	it to you?	Page 127	2	decisions are made.	Page 129
2 3	it to you?  A. No.	Page 127	2 3	decisions are made. Q. So is it correct that what	Page 129
2 3 4	it to you?  A. No. Q. Okay. So I'm trying to	Page 127	2 3 4	decisions are made. Q. So is it correct that what happened was someone just sent you a	Page 129
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		Page 130			Page 132
1	Q. But you didn't have ask him		1	A. Yes.	
2	to file the suit, did you?		2	Q. You didn't ask anyone to put	
3	A. Personally, no.		3	that together, did you?	
4	Q. You didn't ask him to draft		4	A. I know that it was a list of	
5	a complaint, did you, ma'am?		5	a list of places that we saw in	
6	A. Personally, no.		6	Chicago that were substandard.	
7	Q. Do you know who did?		7	Q. I understand that. But you	
8	A. I assume Disabled Patriots			•	
			8	didn't ask anyone to draft a lawsuit,	
9	which means Maria.		9	did you?	
10	Q. But you don't know that?		10	A. No.	
11	A. I'm assuming.		11	Q. Okay. So you get this in	
12	Q. Okay. But you don't know		12	the mail and it's sort of out of the	
13	that for sure, do you?		13	blue, right?	
14	A. No.		14	A. No, because I know we're	
15	Q. Okay. And how would Maria		15	always working on cases.	
16	have known that a lawsuit should be put		16	Q. Well, yeah, you're not	
17	together?		17	surprised that someone sent you a	
18	A. Because we talk about what		18	lawsuit but no one had told you you	
19	we're seeing out in the field all the		19	were going to receive this, right?	
20	time.		20		
21				A. No, this is what I do.	
	Q. Okay. So you talked to		21	Q. Okay. And so then you	
22	Maria about this incident in Illinois		22	looked at the complaint. Did you review	
23	when?		23	it for accuracy?	
24	A. I'm sure when I returned.		24	A. Absolutely.	
25	Q. Okay. Do you remember		25	Q. And then you didn't make any	
		Page 131			Page 133
1	talking to her about it?	Page 131	1	changes, did you?	Page 133
1 2	talking to her about it?  A. Sure.	Page 131	1 2	changes, did you?	Page 133
2	A. Sure.	Page 131	2	A. No.	Page 133
2	A. Sure. Q. What did you tell her?	Page 131	2 3	A. No. Q. And it looks an awful lot	Page 133
2 3 4	<ul><li>A. Sure.</li><li>Q. What did you tell her?</li><li>A. I talked to her about the</li></ul>	Page 131	2 3 4	A. No. Q. And it looks an awful lot like a lot of the suits you filed,	Page 133
2 3 4 5	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a	Page 131	2 3 4 5	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right?	Page 133
2 3 4 5 6	A. Sure. Q. What did you tell her? A. I talked to her about the fact that I saw numerous things on a trip to Chicago all that were appalling.	Page 131	2 3 4 5 6	A. No. Q. And it looks an awful lot like a lot of the suits you filed, right? A. Correct.	Page 133
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		Page 134			Page 136
1	there was nothing erroneous in the		1	A. I don't know.	
2	report or the complaint.		2	Q. But you told me earlier that	
3	Q. A lot of the things in the		3	he never told you he had ever been	
4	complaint, ma'am, are things you never		4	there, right?	
5	saw at Town & Country, right?		5	A. We never talked about it but	
6	A. I don't know what you're		6	it's just in the cycle of how things	
7	talking about.		7	are done. I tell people what I see.	
8	Q. Well, there's all sorts of		8	· · · · · · · · · · · · · · · · · · ·	
9	allegations in your complaint, and			If Dave thinks that there's enough merit	
	_ , , ,		9	on what I'm telling him, he goes out	
10	there's things that you never personally		10	and takes a look.	
11	observed in Illinois, are they, ma'am?		11	Q. I understand that's how it	
12	A. Like what?		12	usually works. But in this particular	
13	Q. Well, you just listed for		13	suit, you had no knowledge that David	
14	all me all the violations that you were		14	had ever actually been there because he	
15	aware of, right?		15	never told you he had been there, right?	
16	A. Hm-hm.		16	A. That is correct but there's	
17	Q. We went through that in		17	no lawsuit without an expert taking a	
18	detail, didn't we?		18	look.	
19	A. I told you as best as I		19	Q. Well, there shouldn't be.	
20	could remember.		20	A. Well, there isn't	
21	Q. Correct. But the thing that		21		
22				Q. You didn't know Pedraza had	
	was sent to you in the mail out of the		22		
23	blue by Mr. Bacon's office it contained		23	A. There is no never a	
24	a lot of other violations that you never		24		
25	even saw, right?		25	taking a look.	
		Page 135			Page 137
1	A. But what I'm telling you is	Page 135	1	O Ma'am with regard to this	Page 137
1 2	A. But what I'm telling you is that if I find a lot of violations	Page 135	1 2	Q. Ma'am, with regard to this	Page 137
2	that if I find a lot of violations	Page 135	2	lawsuit we're here for today	Page 137
2 3	that if I find a lot of violations personally, it's enough to get somebody	Page 135	2 3	lawsuit we're here for today A. Okay.	Page 137
2 3 4	that if I find a lot of violations personally, it's enough to get somebody out there to take another look.	Page 135	2 3 4	lawsuit we're here for today A. Okay. Q nobody ever told you that	Page 137
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		Page 138			Page 140
1	nobody ever told you specifically that		1	Q. Okay. And we talked about	
2	Pedraza had ever been or anyone else had		2	Maria Gallagher. Do you have her	
3	ever been to Town & Country, right?		3	address or contact information?	
4	A. Right.		4	A. I have a phone number.	
5	Q. Okay. Now, in this suit,		5	Q. What's that?	
6	ma'am, if you do prevail, do you get		6	A. Hold on. Also, I'm going to	
7	anything from it yourself, other than		7	need a break to get some water and go	
8	the satisfaction of knowing that things		8	the bathroom. One second.	
9	might be corrected?		9	MR. BACON: Michael, what do you	
10	A. Nothing.		10	want to do? Do you want to take a ten	
11			11	· · · · · · · · · · · · · · · · · · ·	
	Q. You get nothing out of it,		12	minute break or something?	
12	right?			MR. LEONARD: Do you want to	
13	A. Nothing.		13	take ten?	
14	Q. You have no interest, right?		14	MR. BACON: How do you want to	
15	A. Nothing.		15	do this, as far as the telephone calls	
16	Q. And likewise, Disabled		16	are concerned? Should we just leave the	
17	Patriots, if you prevail, likewise other		17	lines open?	
18	than getting satisfaction, gets nothing		18	MR. LEONARD: Yeah, just leave it	
19	out of it either, right?		19	open.	
20	A. That is correct.		20	MR. BACON: Ten minutes.	
21	Q. Okay. Who were the other		21	(Recess taken.)	
22	members of Disabled Patriots besides		22	Q. Ready to proceed?	
23	yourself and Ms. Gallagher?		23	A. Yes.	
24	A. I haven't met them but there		24	Q. You understand you're back on	
25	are people that work all over the East		25	the record and under oath, ma'am?	
	are people that work all over the East		23		
		Page 139			Page 141
1	Coast.	Page 139	1	A. Yes.	Page 141
1 2	Q. But can you identify for me,	Page 139	1 2	Q. When we took a break	Page 141
		Page 139			Page 141
2	Q. But can you identify for me,	Page 139	2	Q. When we took a break	Page 141
2 3 4	Q. But can you identify for me, ma'am, as the vice-president and director of Disabled Patriots, the	Page 139	2 3 4	Q. When we took a break first of all, you were going to get me you did get me Maria Gallagher's	Page 141
2 3 4 5	Q. But can you identify for me, ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides	Page 139	2 3 4 5	Q. When we took a break first of all, you were going to get me you did get me Maria Gallagher's phone number, correct?	Page 141
2 3 4 5 6	Q. But can you identify for me, ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher?	Page 139	2 3 4 5 6	Q. When we took a break first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here.	Page 141
2 3 4 5 6 7	Q. But can you identify for me, ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher?  A. There's a gentleman named	Page 139	2 3 4 5 6 7	Q. When we took a break first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that?	Page 141
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2 3 4 5 6 7 8 9	Q. But can you identify for me, ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher?  A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus?	Page 139	2 3 4 5 6 7 8 9	Q. When we took a break first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay.	Page 141
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. But can you identify for me, ma'am, as the vice-president and director of Disabled Patriots, the identity of a single member besides yourself and Ms. Gallagher?  A. There's a gentleman named Marcus that lives in Alabama and he's Q. Marcus?  A. Marcus, and he's very active. Q. What's his last name? A. I don't know. Q. Do you have any idea where he lives?  A. Atlanta. Q. Okay. Have you ever spoken to him?  A. No. Q. Is he disabled? A. Yes. Q. Okay. What's his disability? A. I believe he's in a	Page 139	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. When we took a break first of all, you were going to get me you did get me Maria Gallagher's phone number, correct? A. I have it right here. Q. And what's that? A. It is 561. Q. Okay. A. 452. Q. Okay. A. 4155. Q. 4155? A. Correct. Q. Okay. We were talking about the membership of Disabled Patriots and we already talked about yourself, Ms. Gallagher. How long has she been a member? A. From the beginning. Q. You don't know of any records that show how long she's been a	Page 141

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		Page 142			Page 144
1	Q. You've never seen them?	•	1	A. He lives in Avon Lake, Ohio.	<u>.</u> ·
2	A. No.		2	Q. Okay. What's his address?	
3	Q. This individual Marcus who		3	A. I don't remember offhand.	
4	lives in Atlanta, you don't know his		4	It's on Lear Road in Avon Lake?	
5	last name?		5	Q. How do you spell the name of	
6	A. I don't.		6	the road?	
7			7		
	Q. And you don't know his phone		1 -	A. LEAR.	
8	number?		8	Q. And Avon Lake, and that's	
9	A. No.		9	outside of Cleveland?	
10	Q. And you don't know his		10	A. It is. It's a suburb.	
11	address?		11	<ul><li>Q. Do you have his phone</li></ul>	
12	A. I don't.		12	number?	
13	Q. And you've never met him?		13	A. I don't.	
14	A. No.		14	Q. Do you have his e-mail	
15	Q. Have you ever spoken to him?		15	address?	
16	A. No.		16	A. At home.	
17	Q. And how do you know he's a		17	Q. Do you have Marcus' phone	
18	member?		18	number or e-mail address at home?	
19	A. Because I've been told and I		19	A. I do not.	
20	heard him referenced numerous times.		20		
21				Q. Okay. Mr. Greiner, how long	
	Q. Okay. And your understanding	I	21	have you known him?	
22	is that he uses a wheelchair?		22	A. Three or four years.	
23	A. Yes, I know he does.		23	Q. How do you know he's a	
24	Q. You've never seen him use a		24		
25	wheelchair, have you?		25	A. Because he filled out an	
		Page 143			Page 145
1	A. No.	-	1 1	application and I think it was in my	J
			1 1		
2	O. And you know nothing about		1   2	· ·	
2	Q. And you know nothing about his alleged disability, do you, ma'am?		2	presence.	
3	his alleged disability, do you, ma'am?		2 3	presence. Q. Okay. And you say he uses a	
3 4	his alleged disability, do you, ma'am? A. I do not.		2 3 4	presence. Q. Okay. And you say he uses a wheelchair?	
3 4 5	his alleged disability, do you, ma'am? A. I do not. Q. Okay. Can you identify any		2 3 4 5	presence. Q. Okay. And you say he uses a wheelchair? A. Yes.	
3 4 5 6	his alleged disability, do you, ma'am? A. I do not. Q. Okay. Can you identify any other members for me?		2 3 4 5 6	presence. Q. Okay. And you say he uses a wheelchair? A. Yes. Q. And how long has he used a	
3 4 5 6 7	his alleged disability, do you, ma'am? A. I do not. Q. Okay. Can you identify any other members for me? A. I can't.		2 3 4 5 6 7	presence. Q. Okay. And you say he uses a wheelchair? A. Yes. Q. And how long has he used a wheelchair?	
3 4 5 6 7 8	his alleged disability, do you, ma'am? A. I do not. Q. Okay. Can you identify any other members for me? A. I can't. Q. None?		2 3 4 5 6 7 8	presence. Q. Okay. And you say he uses a wheelchair? A. Yes. Q. And how long has he used a wheelchair? A. He is now 28 years old.	
3 4 5 6 7 8 9	his alleged disability, do you, ma'am? A. I do not. Q. Okay. Can you identify any other members for me? A. I can't. Q. None? A. I know that there are other		2 3 4 5 6 7 8 9	presence. Q. Okay. And you say he uses a wheelchair? A. Yes. Q. And how long has he used a wheelchair? A. He is now 28 years old. He's used it since he was 16.	
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		Page 146			Page 148
1	A. No, but I know there are		1	<ul> <li>A. Not that I participated in.</li> </ul>	
2	others.		2	Q. Well, was there ever one	
3	Q. How do you know that?		3	before that you know of?	
4	<ul> <li>A. Because we talked about them.</li> </ul>		4	A. I don't know.	
5	Their names were mentioned.		5	Q. Okay. And why was this	
6	Q. When?		6	particular meeting called? You said	
7	<ul> <li>A. At this meeting in</li> </ul>		7	there was some concern about following	
8	Pittsburgh.		8	the corporate formalities. How did that	
9	<ul><li>Q. So someone has told you over</li></ul>		9	come to Disabled Patriots' attention?	
10	the years that there might be as many		10	A. I don't know. I just know	
11	as 20 members but you can't identify any		11	that there are policies and procedures	
12	of them?		12	that are necessary to maintain our	
13	A. I can't, yeah, except for		13	incorporation status in good standing.	
14	Q. How would I find out their		14	Q. Who were the participants in	
15	identities		15	this telephone conference?	
16	A. You would ask		16	A. Maria Gallagher and I'm	
17	Q that they exist?		17	trying to recall who else was present.	
18	A. You would ask Maria		18	Again, it was a teleconference.	
19	Gallagher.		19	Q. You don't know?	
20	Q. Okay. I'm sorry, I think		20	A. Um-um.	
21	you already told me this and I		21	Q. Is that a no?	
22	apologize, if I asked. John Greiner,		22	A. No.	
23	you know he's a member because you saw		23	Q. And you've never seen any	
24	him filling out an application?		24	minutes from the meeting?	
25	A. Yes.		25	A. I have not.	
	· · · · · · · · · · · · · · · · · · ·		<u> </u>		
1	Q. Do you know if he ever sent	Page 147	1	Q. Were you physically in the	Page 149
2	it in?		2	same room as Maria Gallagher?	
3	A. I'm sure he did.		3	A. No, it was a teleconference.	
4	Q. You just don't know one way		4	We did it by phone.	
5	or the other?		5	Q. You said something earlier	
6	A. No, I'm pretty sure he did.		6	about seeing her taking notes or	
7	Q. You think that he would		7	something. So you don't know whether	
8	have?		8	anyone took any notes?	
9	A. I think he did.		9	A. No, no. No, I saw her	
10	Q. Okay.		10	taking notes in Pittsburgh when we were	
11	A. I think his name was		11	we had a physical meeting.	
12	mentioned also at this meeting.			Q. This meeting that took place,	
	mendonea albo al una Meelina.		11)		
			12		
13	Q. Okay. The other people who		13	this telephone conversation, it was in	
13 14	Q. Okay. The other people who might be members, you don't know		13 14	this telephone conversation, it was in what month?	
13 14 15	Q. Okay. The other people who might be members, you don't know anything about them?		13 14 15	this telephone conversation, it was in what month?  A. I'm sorry?	
13 14 15 16	Q. Okay. The other people who might be members, you don't know anything about them?  A. No.		13 14 15 16	this telephone conversation, it was in what month?  A. I'm sorry?  Q. The annual meeting that was	
13 14 15 16 17	Q. Okay. The other people who might be members, you don't know anything about them?  A. No.  Q. And is there any way that		13 14 15 16 17	this telephone conversation, it was in what month?  A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that?	
13 14 15 16 17 18	Q. Okay. The other people who might be members, you don't know anything about them?  A. No. Q. And is there any way that the group conducts business? For		13 14 15 16 17 18	this telephone conversation, it was in what month?  A. I'm sorry?  Q. The annual meeting that was the telephone conference, when was that?  A. Yes, that was in the autumn,	
13 14 15 16 17 18 19	Q. Okay. The other people who might be members, you don't know anything about them?  A. No. Q. And is there any way that the group conducts business? For instance, are there is there an		13 14 15 16 17 18 19	this telephone conversation, it was in what month?  A. I'm sorry?  Q. The annual meeting that was the telephone conference, when was that?  A. Yes, that was in the autumn, also.	
13 14 15 16 17 18 19 20	Q. Okay. The other people who might be members, you don't know anything about them?  A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group		13 14 15 16 17 18 19 20	this telephone conversation, it was in what month?  A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07?	
13 14 15 16 17 18 19 20 21	Q. Okay. The other people who might be members, you don't know anything about them?  A. No. Q. And is there any way that the group conducts business? For instance, are there is there an annual meeting? How does the group conduct its business?		13 14 15 16 17 18 19 20 21	this telephone conversation, it was in what month?  A. I'm sorry? Q. The annual meeting that was the telephone conference, when was that? A. Yes, that was in the autumn, also. Q. Of 07? A. Yes. No yes, the autumn	
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		Page 150			Page 152
1	A. Yes, probably it would give	.g	1	remember.	
2	a date.		2	Q. And why were they removed?	
3	Q. Okay.		3	A. I don't know.	
4	A. Probably.		4	Q. There was no discussion as	
5	Q. And you don't know any		5	to why they're going to be removed?	
6	participants besides yourself and Maria?		6	A. No.	
7	A. No, I know that there were		7	Q. Any other votes taken other	
8	some people that were there by proxy.		8	than who's going to be the officers?	
9	Q. Okay. What does that mean		9	A. I don't believe so.	
10	by proxy?		10	Q. Okay. Ma'am, with respect	
11	A. That they had given		11	to your own disability.	
12	permission to Maria for voting purposes.		12	A. Yes.	
13			13		
	Q. Who was given permission?		14	Q. How long have you been disabled?	
14	What people?				
15	A. Members that weren't present.		15	A. I've been in a wheelchair it	
16	Q. Correct. But who are they?		16	will be seven years this spring.	
17	A. I know one was Marcus was		17	Q. Okay. And I'm sorry, this	
18	not present at the teleconference.		18	might be difficult but what were the	
19	Q. Anybody else?		19	circumstances that led you to start	
20	A. I don't know. I know that		20	using a wheelchair?	
21	there were other people spoken of but I		21	A. I have multiple sclerosis and	
22	can't remember names.		22	getting around with the walker became	
23	Q. Okay. And what votes were		23	increasingly more difficult.	
24	taken at that meeting, the telephone		24	Q. Okay. And at some point in	
25	conference annual meeting?		25	time, you were not able to walk?	
		Page 151			Page 153
۱.	A. It was a teleconference and	1 090 101			1 490 400
			l 1	A That is correct	
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$			1 2	A. That is correct. O. And when was that?	
2	I'm sure Maria took minutes of what was		2	Q. And when was that?	
2 3	I'm sure Maria took minutes of what was transpiring.		2 3	<ul><li>Q. And when was that?</li><li>A. It'll be seven years in the</li></ul>	
2 3 4	I'm sure Maria took minutes of what was transpiring.  Q. Do you have any notes about		2 3 4	Q. And when was that? A. It'll be seven years in the spring.	
2 3 4 5	I'm sure Maria took minutes of what was transpiring. Q. Do you have any notes about that meeting?		2 3 4 5	Q. And when was that? A. It'll be seven years in the spring. Q. Okay. And in terms of	
2 3 4 5 6	I'm sure Maria took minutes of what was transpiring. Q. Do you have any notes about that meeting? A. I do not.		2 3 4 5 6	Q. And when was that? A. It'll be seven years in the spring. Q. Okay. And in terms of treatment for that, are there anything	
2 3 4 5 6 7	I'm sure Maria took minutes of what was transpiring. Q. Do you have any notes about that meeting? A. I do not. Q. But what was voted on? You		2 3 4 5 6 7	Q. And when was that? A. It'll be seven years in the spring. Q. Okay. And in terms of treatment for that, are there anything that you in terms of a drug regiment	
2 3 4 5 6 7 8	I'm sure Maria took minutes of what was transpiring. Q. Do you have any notes about that meeting? A. I do not. Q. But what was voted on? You said there was votes taken.		2 3 4 5 6 7 8	Q. And when was that? A. It'll be seven years in the spring. Q. Okay. And in terms of treatment for that, are there anything that you in terms of a drug regiment or anything else?	
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		Page 154			Page 156
1	may be a dumb question, too broad.		1	residential treatment of emotionally	
2	Obviously, you're limited substantially		2	disturbed kids.	
3	in terms of the wheelchair; and then,		3	Q. What is your present age?	
4	therefore, that has implications for		4	A. 60.	
5	many of the things you do, correct?		5	Q. 60?	
6	A. Correct.		6	A. Yes.	
7	<ul><li>Q. When did you last have</li></ul>		7	<ul><li>Q. And what's your present</li></ul>	
8	employment?		8	address?	
9	A. Outside of my home I worked		9	A. 2501 North Taylor Road,	
10	in the wheelchair for selling AT&T		10	Apartment 310, Cleveland Heights, Ohio,	
11	cell phones out of Best Buy after I		11	44118.	
12	went into the wheelchair, as kind of a		12	Q. And do you've lived there	
13	test case.		13	about how long?	
14	Q. What do you mean a test		14	A. Two years in March.	
15	case, to see if you could do it?		15	Q. Okay. Where did you live	
16	A. I mean, I have not worked		16	before that?	
17	outside of the home from that since		17	A. I lived in Avon Lake on Lear	
18	I had been disabled. So I wanted to		18	Road.	
19	see what I could do in the wheelchair.		19	Q. Okay. And you have three	
20	Q. I got you. So you said your		20	children; they're all in their 20's or	
21	disability began in terms of the		21	above?	
22	wheelchair began in what, about 2001?		22	A. Yes.	
23	A. Yeah.		23	Q. And do you have any sources	
24	Q. Okay. Were you working		24	of income?	
25	before 2001?		25	A. Social Security Disability.	
		Dana 155			D 157
1	A. Sure.	Page 155	1	Q. And how long have you had	Page 157
2	Q. In what capacity?		2	that?	
3	A. I sold ads. I was an ad		3	A. Since I became disabled.	
4	salesperson for the Free Times		4	Q. So you went through the	
5	Newspaper.			Q. 50 you werk through the	
	racaspaper.		5	process of application, all that, back	
6			5	process of application, all that, back	
6 7	Q. Is that in Cleveland?		6	in the late 1990's, early 2000's?	
7	<ul><li>Q. Is that in Cleveland?</li><li>A. Yes, it is. It's a local</li></ul>		6 7	in the late 1990's, early 2000's?  A. Correct.	
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			<u> </u>		
		Page 158			Page 160
1	<ul> <li>A. I don't know exactly but I</li> </ul>		1	everywhere pretty much are the same.	
2	know that Chicago was trying. It was a		2	Q. Okay. And I take it, it was	
3	trying environment.		3	the same circumstances that lead you to	
4	Q. What I'm getting at, I		4	file those other eight or nine or ten	
5	guess, is well, just forget that.		5	suits, in that Mr. Bacon sent you them	
6	How many other lawsuits have you		6	in the mail, you looked at them, and	
7	filed that are based upon your visit to		7	then they were filed?	
8	the Chicago area in August 2007?		8	A. Correct.	
9	A. I'm not sure.		9	Q. And you didn't make any	
10	Q. Approximately?		10	changes to them?	
11	A. I can't tell you. I don't		11	A. Correct.	
12	know.		12	<ul><li>Q. When did you start filing</li></ul>	
13	Q. You don't know how many		13	lawsuits?	
14	lawsuits you filed?		14	A. Shortly after I became	
15	A. No, I file a lot of		15	involved with Disabled Patriots.	
16	lawsuits, sir.		16	Q. And of all the suits you've	
17	Q. Is this more than 25?		17	filed, have they been in conjunction	
18	A. No, no, no.		18	with Disabled Patriots?	
19	Q. Less than ten?		19	A. Pretty much, yes.	
20	A. In Chicago, less than ten.		20	Q. And is it fair to say you	
21	_ ·		21	filed more than a hundred so far?	
	Q. Okay. At the time you filed				
22	this particular lawsuit that we're here		22	A. I don't know if it's a	
23	for today, at or about that same time		23	hundred.	
24	you filed about eight or nine others; is		24	Q. What's your best estimate?	
25	that right?		25	A. I would certainly say	
		Page 159			Page 161
1	A. Perhaps.	Page 159	1	somewhere between 70 and a hundred.	Page 161
1 2	A. Perhaps. O. Well, is that your best	Page 159			Page 161
2	Q. Well, is that your best	Page 159	2	Q. Have they all been filed in	Page 161
2	Q. Well, is that your best estimate?	Page 159	2 3	Q. Have they all been filed in federal courts around the country?	Page 161
2 3 4	Q. Well, is that your best estimate? A. Yes.	Page 159	2 3 4	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland	Page 161
2 3 4 5	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in	Page 159	2 3 4 5	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes.	Page 161
2 3 4 5 6	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern	Page 159	2 3 4 5 6	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this	Page 161
2 3 4 5 6 7	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois?	Page 159	2 3 4 5 6 7	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this batch of Chicago lawsuits in the fall of	Page 161
2 3 4 5 6 7 8	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct.	Page 159	2 3 4 5 6 7 8	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this batch of Chicago lawsuits in the fall of 2007, had your other 50 or 60 or 70	Page 161
2 3 4 5 6 7 8 9	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have	Page 159	2 3 4 5 6 7 8 9	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this batch of Chicago lawsuits in the fall of 2007, had your other 50 or 60 or 70 suits all been filed in the Cleveland	Page 161
2 3 4 5 6 7 8 9	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations,	Page 159	2 3 4 5 6 7 8 9 10	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this batch of Chicago lawsuits in the fall of 2007, had your other 50 or 60 or 70 suits all been filed in the Cleveland area?	Page 161
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2 3 4 5 6 7 8 9 10	Q. Well, is that your best estimate? A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations, right?	Page 159	2 3 4 5 6 7 8 9 10 11	Q. Have they all been filed in federal courts around the country? A. In the Greater Cleveland area, yes. Q. So before you filed this batch of Chicago lawsuits in the fall of 2007, had your other 50 or 60 or 70 suits all been filed in the Cleveland area? A. Yes.	Page 161
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Well, is that your best estimate?  A. Yes. Q. And you filed them all in federal court in Chicago in the Northern District of Illinois? A. Correct. Q. Okay. And they all have essentially the identical allegations, right?  A. Pretty much. Q. Okay. In terms of the alleged violations, they all have essentially the identical allegations, right?  A. Similar. Q. Okay. And I'm trying to understand if all these different places had all sorts of different violations, why are the allegations in the eight or nine or ten lawsuits essentially identical with regard to the alleged	Page 159	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Have they all been filed in federal courts around the country?  A. In the Greater Cleveland area, yes.  Q. So before you filed this batch of Chicago lawsuits in the fall of 2007, had your other 50 or 60 or 70 suits all been filed in the Cleveland area?  A. Yes.  Q. What other geographic locations have you filed lawsuits in?  A. I went to New Jersey once and so there's some cases that are pending in New Jersey.  Q. About how many?  A. Three or four.  Q. And they were also filed in conjunction with Disabled Patriots?  A. I believe so, yes.  Q. Okay. And where in New Jersey were they filed in federal court?	Page 161

		Page 162			Page 164
1	still pending?		1	here, right?	
2	A. Yes.		2	A. Absolutely, I have copies of	
3	Q. Okay. Has Mr. Bacon been		3	complaints. I have copies of filed	
4	your attorney for all these cases?		4	suits. I have copies of outcomes of	
5	A. I work with a number of		5	everything.	
6	attorneys and I can't tell you right now		6	Q. So if we asked you to	
7	offhand		7	produce all your records about your	
8			8	other lawsuits, you'd have a whole batch	
	Q. Okay.				
9	A who does what.		9	of stuff you could produce?	
10	Q. So New Jersey, Cleveland, and		10	A. Yes, I do.	
11	Chicago, those are the areas you can		11	Q. Okay. Other than having	
12	recall that you filed these federal		12	<u> </u>	
13	lawsuits in?		13	regularly scheduled meetings or anything	
14	A. Columbus, Ohio.		14	like, right?	
15	Q. Also in federal court?		15	A. No, but I'm in constant	
16	A. Yes.		16	contact with Maria Gallagher.	
17	Q. Okay. And did you file a		17	Q. Okay. Have you filed any	
18	whole bunch of them there?		18	suits in state court?	
19	A. Yes.		19	A. I'm not in state court. I'm	
20			20		
	Q. About how many?			not aware of having filed any in state	
21	A. I can't tell you.		21	court.	
22	Q. Dozens?	,	22	Q. Have you been sued by	
23	A. I don't think dozens but	•	23	anybody?	
24	certainly		24	A. In relation to what?	
25	Q. More than ten?		25	Q. Anything.	
		Da 163			D 165
	A Marile and Marile annual	Page 163		A. T. coult coult best This moves	Page 165
1	A. Maybe not. Maybe around	Page 163	1	A. I can't say that I've never	Page 165
2	ten, I don't know.	Page 163	2	been sued. I might have been sued for	Page 165
2	ten, I don't know. Q. Okay. Do you keep any	Page 163	2 3	been sued. I might have been sued for debt-related purposes.	Page 165
2 3 4	ten, I don't know. Q. Okay. Do you keep any records of any list or anything like	Page 163	2 3 4	been sued. I might have been sued for debt-related purposes. Q. You've been sued by like a	Page 165
2 3 4 5	ten, I don't know. Q. Okay. Do you keep any records of any list or anything like that, that would identify all the	Page 163	2 3 4 5	been sued. I might have been sued for debt-related purposes. Q. You've been sued by like a collection type cases?	Page 165
2 3 4	ten, I don't know. Q. Okay. Do you keep any records of any list or anything like that, that would identify all the various cases, these 75 or so you filed	Page 163	2 3 4 5 6	been sued. I might have been sued for debt-related purposes. Q. You've been sued by like a collection type cases? A. Yes.	Page 165
2 3 4 5	ten, I don't know. Q. Okay. Do you keep any records of any list or anything like that, that would identify all the	Page 163	2 3 4 5	been sued. I might have been sued for debt-related purposes. Q. You've been sued by like a collection type cases?	Page 165
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		Page 166			Page 16
1	before?		1	some of these documents you identified	
2	A. Correct.		2	for us but I don't have any questions	
3	Q. And apart from and all		3	right now. Counsel?	
4	five of those or so, they were all		4	THE WITNESS: Tom?	
5	collection type matters?		5	MR. LEONARD: Mr. Bacon?	
6	A. Yes.		6	MR. BACON: I apologize. I keep	
7	Q. Have you ever been sued as a		7	this button on so if I start talking	
8	- · · · · · · · · · · · · · · · · · · ·			<u> </u>	
	defendant in any other type of case?		8	and then realize no one's hearing me.	
9	A. I can't think what.		9	No, I have no questions at this time.	
10	Q. Okay. And then have you		10	You want to just talk about	
11	been other than the Disabled Patriots		11	whether or not she wants to waive	
12	type of cases we've talked about and the		12	or	
13	collections cases, have you ever been a		13	MR. LEONARD: Yeah. Ma'am, under	
14	party to or a witness in any other		14	the rules, you're entitled to receive a	
15	types of cases that you can recall?		15	copy of this transcript and review it	
16	A. I have a personal injury		16	for accuracy or to waive that right and	
17	case pending right now.		17	not receive that and to have what the	
18	Q. And where is that case		18	court reporter has typed as your	
19	filed, ma'am?		19	testimony.	
20	•		20	What do you choose to do?	
	A. Pennsylvania.		l.	THE WITNESS: I'm fine either	
21	Q. In state court?		21		
22	A. I don't know. It may the		22	way. I have confidence	
23	truth is, it might not have even been		23	MR. LEONARD: Well, it's your	
24	filed yet. We're		24	decision.	
25	Q. Who's your attorney?		25	MR. BACON: We'd like to see it.	
		Page 167			Page 16
1	A. Lawrence Fuller.	-	1	THE WITNESS: Okay.	-
2	Q. And what's the nature of		2	MR. LEONARD: All right. Ma'am,	
3					
	that matter, ma'am?			thanks very much for your time and Miss	
	that matter, ma'am?		3	thanks very much for your time and Miss	
4	A. I was on a wheelchair lift		3 4	Court Reporter, what's regular delivery,	
4 5	A. I was on a wheelchair lift on a vacation last summer and the lift		3 4 5	Court Reporter, what's regular delivery, two weeks or so?	
4 5 6	A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the		3 4 5 6	Court Reporter, what's regular delivery, two weeks or so?  NOTARY PUBLIC: Yeah, ten days,	
4 5 6 7	A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the ground.		3 4 5 6 7	Court Reporter, what's regular delivery, two weeks or so?  NOTARY PUBLIC: Yeah, ten days, two weeks.	
4 5 6 7 8	A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the ground.  Q. Who is the defendant or a		3 4 5 6 7 8	Court Reporter, what's regular delivery, two weeks or so?  NOTARY PUBLIC: Yeah, ten days, two weeks.  MR. LEONARD: Okay. Thanks a	
4 5 6 7 8 9	A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the ground.  Q. Who is the defendant or a possible defendant?		3 4 5 6 7 8 9	Court Reporter, what's regular delivery, two weeks or so?  NOTARY PUBLIC: Yeah, ten days, two weeks.  MR. LEONARD: Okay. Thanks a lot everybody.	
4 5 6 7 8 9	A. I was on a wheelchair lift on a vacation last summer and the lift broke and I was thrown 7 feet to the ground.  Q. Who is the defendant or a possible defendant?  A. Bus company.		3 4 5 6 7 8 9 10	Court Reporter, what's regular delivery, two weeks or so?  NOTARY PUBLIC: Yeah, ten days, two weeks.  MR. LEONARD: Okay. Thanks a lot everybody.  THE WITNESS: Thanks.	
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	Page 170			Page 172
1	CEFARATTI GROUP FILE NO. 13289	1	CERTIFICATE	-
2	CASE CAPTION: DISABLED PATRIOTS OF	2	•	
3	AMERICA VS. TOWN & COUNTRY CHICAGO	3	State of Ohio ) SS.:	
4	DEPONENT: BONNIE KRAMER	4	County of Cuyahoga. )	
5	DEPOSITION DATE: JANUARY 30, 2008	5	I, Kathy Davian, a Notary Public	
6		6	within and for the State of Ohio, duly	
7	(SIGN HERE)	7	commissioned and qualified, do hereby	
8	The State of Ohio, )	8	certify that the within named witness,	
9	County of Cuyahoga ) SS:	9	was duly sworn to testify the truth, the	
10	Before me, a Notary Public in and	10	whole truth and nothing but the truth in	
11	for said County and State, personally	11	the cause aforesaid; that the testimony	
12	appeared BONNIE KRAMER, who acknowledged	12	then given by the witness was by me	
13	that he/she did read his/her transcript	13	reduced to stenotypy in the presence of	
14	in the above-captioned matter, listed	14	said witness; afterwards transcribed,	,
15	any necessary corrections on the	15	and that the foregoing is a true and	
16	accompanying errata sheet, and did sign	16	correct transcription of the testimony	
17	the foregoing sworn statement and that	17	so given by the witness.	-
18	the same is his/her free act and deed.	18	I do further certify that this	
19	IN TESTIMONY WHEREOF, I have	19	deposition was taken at the time and	
20	hereunto affixed my name and official	20	place in the foregoing caption	
21	seal at , this	21	specified.	
22	day of , A.D. 2008.	22	I do further certify that I am	
23		23	not a relative, counsel or attorney for	
24		24	either party, or otherwise interested in	
25	Notary Public Commission Expires	25	the event of this action.	1
	Page 171		T	Page 173
1	ERRATA SHEET	1	I am not, nor is the court	Page 173
2	_	2	reporting firm with which I am	Page 173
2 3	ERRATA SHEET	2 3	reporting firm with which I am affiliated, under a contract as defined	Page 173
2 3 4	ERRATA SHEET	2 3 4	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).	Page 173
2 3 4 5	ERRATA SHEET	2 3 4 5	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have	Page 173
2 3 4 5 6	ERRATA SHEET	2 3 4 5 6	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of	Page 173
2 3 4 5 6 7	ERRATA SHEET	2 3 4 5 6 7	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have	Page 173
2 3 4 5 6 7 8	ERRATA SHEET	2 3 4 5 6 7 8	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of	Page 173
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2 3 4 5 6 7 8 9 10 11	ERRATA SHEET	2 3 4 5 6 7 8 9 10	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.	Page 173
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ERRATA SHEET	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28 (D).  IN WITNESS WHEREOF, I have hereunto set my hand this day of , 2008.  Kathy Davian, Notary Public within and for the State of Ohio	Page 173